

January 2, 2010

Office of the General Counsel
Federal Election Commission
999 E. Street, NW
Washington, D.C. 20463

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OFFICE OF GENERAL
COUNSEL

**Complaint of Over Limit Contributions and Request for Audit - Obama for America
(C00431445) and Obama Victory Fund (C00451393)**

**Contributor Database Analysis of Unitemized Contributions
(Supplemental Update to MUR 6142)**

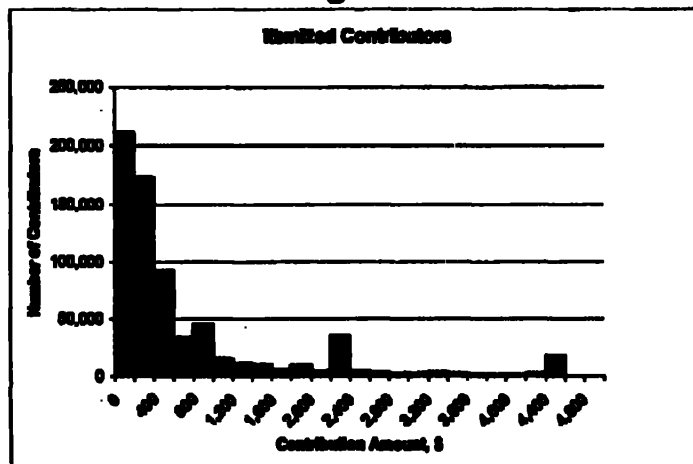
Dear Sir or Madam:

This is a supplemental update to complaint, MUR 6142, pertaining to the Presidential Campaign Funds of Barack Obama regarding over limit campaign contributions and other irregularities of the Campaign Finances of Obama for America (C00431445) and Obama Victory Fund (C00451393). The campaign reports 34% of all contributions as "Unitemized". Is this plausible given the distribution of the reported contributions?

The campaign currently lists \$259,161,572.58 as unitemized contributions. Are these contributions to be believed to be under the reporting limit of \$200? That would require at least 1,295,808 contributors at \$200 each or more likely around 2,591,616 contributors around an average \$100.

A contributor database was developed using the FEC reports shown in Table I. Line items SA17A, SA18 and SB28A were extracted as 2,605,632 records that were cross referenced by contributor. The overall distribution of contributors is summarized in the attached Table II. Contributions are treated as sums for each individual contributor. Individual itemized contributors over \$0 are listed in Table III in increments of \$200 and shown as Figure 1.

Figure 1



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The cumulative distribution of contributions shows three regions of behavior divided by the campaign contribution limits of \$2,300 and \$4,600 as shown in Figure 2.

Figure 2

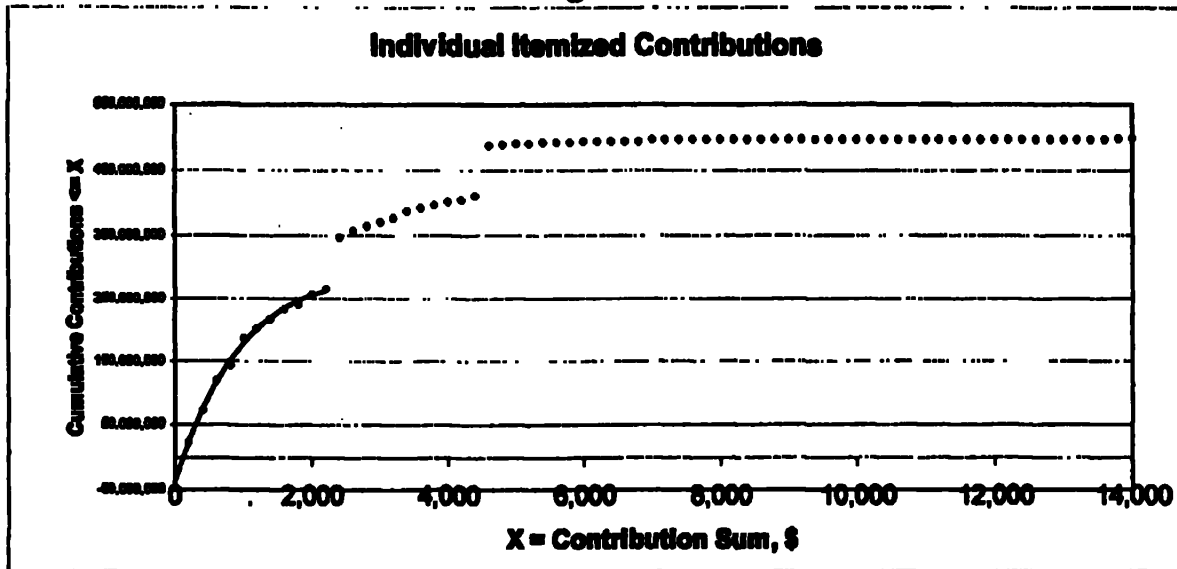
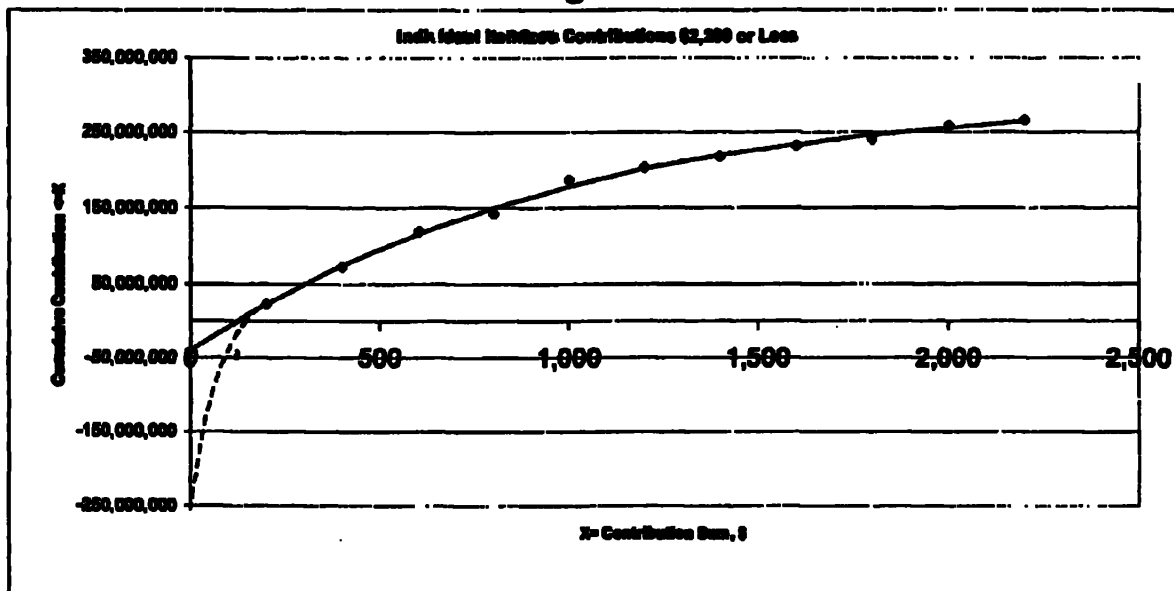


Figure 3 shows an expansion of the region between 0 and \$2,200, with the solid line showing the results from regression analysis of the data points.

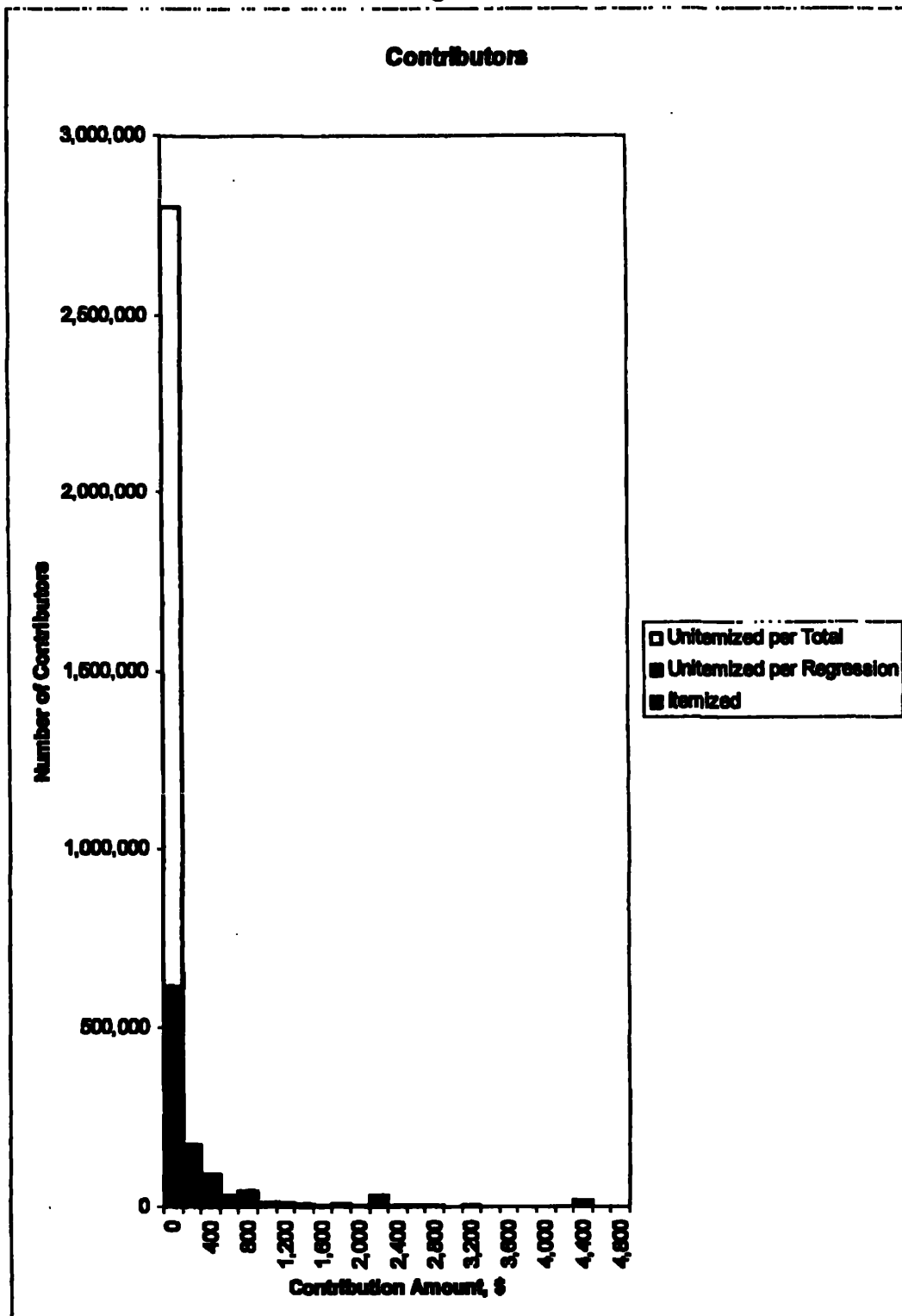
Figure 3



The regression line intersects zero at -\$40 million. Therefore the prediction for the unitemized amount from contributions under \$200 is \$40 million. The standard error of the estimate of the regression is \$4 million (see Table IV). The dashed line represents the behavior if \$259 million were under the reporting limit of \$200.

\$40 million in unitemized contributions would be consistent with approximately 400,000 unitemized contributors donating an average \$100 each. Are there another 400,000 unitemized donors under \$200, or are there 2,591,616 that would account for the total claimed by the campaign?

Figure 4



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Certainly Figure 4 demonstrates that 400,000 is a much more reasonable estimate. And approximately \$219 million of the \$259 million in unitemized contributions are likely to be over the reporting limit. Whom are the contributors of the other \$219 million?

The American People need an audit of the Obama for America (C00431445) and Obama Victory Fund (C00451393). We are depending on the FEC to assure compliance with fair practices. Please audit the Obama Presidential Campaign Funds. Thank you for your time and consideration.

Yours Truly,

Luanne Moore

Luanne Moore

Boynton Beach, FL 33438

Phone:

Email:

Subscribed and sworn to before me this 4th day of January, 2010.

*This is a true signature
of the party*



[Signature]

Notary

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